



Global Crossing®

Michael J. Shortley, III

April 10, 2007

**BY ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: WC Docket No. 05-196  
911 Compliance Status Report  
Global Crossing Local Services, Inc.**

Dear Ms. Dortch:

I am responding to the letter of March 12, 2007 from Kathryn S. Berthot, Spectrum Enforcement Division, Enforcement Bureau, to the undersigned ("Letter") requesting a report on the status of the compliance by Global Crossing Local Services, Inc. ("Global Crossing") with the Commission's VOIP 911 Order and accompanying regulations.<sup>1</sup> Global Crossing is unsure of the meaning of the Letter where it indicates that Global Crossing either was not in compliance with the Commission's rules or had not provided sufficient information for the Commission to determine compliance. As Global Crossing indicated in its letter of November 28, 2005, at that time, Global Crossing did not have any interconnected VOIP customers. Nonetheless, it believed that it had submitted a plan that demonstrated that it could (and would) comply with the Commission's requirements.<sup>2</sup> If there are specific areas in which the Commission has concern, we stand ready to address those concerns.

To date, Global Crossing's sales efforts have almost exclusively been with respect to providing services to Interconnected VOIP providers, rather than providing Interconnected VOIP services themselves. Thus, as was true in November 2005, Global Crossing itself does not provide Interconnected VOIP services to end users.

---

<sup>1</sup> *IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers*, First Report and Order, 20 FCC Rcd 10245 (2005); 47 C.F.R. §§ 9.1-9.5.

<sup>2</sup> See Letter to Marlene H. Dortch, FCC, from Michael J. Shortley, III, Global Crossing (Nov. 28, 2005).

Nonetheless, Global Crossing believes, **as** it set forth in its November 25, 2005, letter, that it has deployed a 911 service that is compliant with the requirements of the Commission's VOIP E911 Order.

In response to the specific questions posed in the Letter, Global Crossing provides the following information:

1. Provision of Compliant 911 Service: Not applicable.
2. 911 Coverage: Not applicable.
3. 911 Routing Information/Connectivity to Wireline E911 Network: Not applicable.
4. New VOIP Customers and/or Marketing of VOIP Service in Non-Compliant Areas: Global Crossing is not marketing interconnected VOIP service in non-compliant areas. Global Crossing currently serves no interconnected VOIP customers.

Respectfully submitted,

